

EXHIBIT A

Re: SERVICE OF COURT DOCUMENTS - CASE NO. 1:23-cv-23004-JB - JANE DOE v. ACADEMIR CHARTER SCHOOLS, INC., ET AL.

Julie B. Karron <jkarron@kelleykronenberg.com>

Thu 8/8/2024 6:36 PM

To: Kyle MacDonald <kyle@dereksmithlaw.com>; Ambar Prieto <aprieto@kelleykronenberg.com>

Cc: Julie McHaffie <jmchaffie@garrisonyount.com>; Scott Yount <syount@garrisonyount.com>; Daisy Trujillo <dtrujillo@garrisonyount.com>; Cassie Cisneros <cassie@dereksmithlaw.com>; David Rodriguez <David@dereksmithlaw.com>; Taylor A. White <twhite@kelleykronenberg.com>

We will file a motion if you can't agree but this will impact mediation since we need the responses.

Julie B. Karron

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From: Kyle MacDonald <kyle@dereksmithlaw.com>

Sent: Thursday, August 8, 2024 5:20:31 PM

To: Ambar Prieto <aprieto@kelleykronenberg.com>

Cc: Julie McHaffie <jmchaffie@garrisonyount.com>; Scott Yount <syount@garrisonyount.com>; Daisy Trujillo <dtrujillo@garrisonyount.com>;

Cassie Cisneros <cassie@dereksmithlaw.com>; David Rodriguez <David@dereksmithlaw.com>; Taylor A. White

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Good afternoon,

Given that the discovery deadline in this matter is August 29, 2024, the discovery requests served below are untimely under Local Rule 26.1(d), which I have included for your reference:

(d) Completion of Discovery. Party and non-party depositions must be scheduled to occur, and written discovery requests and subpoenas seeking the production of documents must be served in sufficient time that the response is due on or before the discovery cutoff date. Failure by the party seeking discovery to comply with this paragraph obviates the need to respond or object to the discovery, appear at the deposition, or move for a protective order.

In light of the rule's clear mandate, we will not be responding to these requests.

Kyle T. MacDonald, Esq.

*Admitted in FL



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From: Ambar Prieto <aprieto@kelleykronenberg.com>

Date: Thursday, August 8, 2024 at 4:43 PM

To: Kyle MacDonald <kyle@dereksmithlaw.com>

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SERVICE OF COURT DOCUMENTS

Court Identity:	United States District Court – Southern District of Florida
Case Number:	1:23-cv-23004-JB
Plaintiff(s):	Jane Doe
Defendant(s):	Academir Charter Schools, Inc. and Superior Charter School Services, Inc.
Document(s) being served:	1. Academir Interrogatories to Mother Doe 2. Academir RFP to Mother Doe
Sender's name & number:	Julie B Karron, Esq. 954-370-9970

Ambar Prieto

Legal Assistant

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